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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BUTTE DIVISION

Kevin Washington,  Plaintiff,  vs.  Matthew Brent Goettsche,  Defendant.	No. 2:20-CV-002-BU-BMM-KLD  <b>JOINT STIPULATION TO STAY ALL DEADLINES AND PROCEEDINGS</b>
FX Solutions, Inc.,  Plaintiff,  vs.  Matthew Brent Goettsche,  Defendant.	No. 2:20-CV-003-BU-BMM-KLD  <b>JOINT STIPULATION TO STAY ALL DEADLINES AND PROCEEDINGS</b>

COMES NOW the Plaintiff, Kevin Washington, and Defendant, Matthew Brent Goettsche, by and through their respective counsel and stipulate that all pending motions and deadlines in both above-captioned cases should be stayed

until April 22, 2020, and request that the Court schedule a status conference for April 22, 2020, or as soon thereafter as the court is available.

The parties are presently engaged in complex settlement discussions that require their full attention and effort. The parties have agreed that these complex settlement discussions can best occur without the press of active litigation and therefore, both cases and all pending motions and briefing should be stayed until April 22, 2020.

This stipulation does not affect this Court's Order Appointing a Receiver in *Washington v. Goettsche*, No. 2:20-CV-002 or the parties' ability to litigate issues that might arise relating to that Receivership.

This stipulation is made without prejudice to Mr. Goettsche's pending motion to compel arbitration in *Washington v. Goettsche*, No. 2:20-CV-002. Mr. Goettsche expressly reserves and does not waive his right to compel arbitration.

WHEREFORE, the parties respectfully request that this Court stay both cases and set a status conference for April 22, 2020, or as soon thereafter as the court is available.

DATED this 3rd day of March, 2020.

KRIS A. MCLEAN LAW FIRM, PLLC

/s/Kris A. McLean  
Kris A. McLean  
Attorney for Plaintiffs

SMITH AND STEPHENS, P.C.

/s/ John E. Smith  
John E. Smith  
Attorney for Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd day of March 2020, the foregoing document was served on the following individuals by ECF filing:

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